

1 David M. Tall  
Oseran, Hahn, P.S.  
2 10900 NE Fourth Street, Suite 1430  
Bellevue, WA 98004  
3 (425) 455-3900

Hon. Marc Barreca  
Hearing Date: September 5, 2014 @ 9:30 am  
Response Date: August 29, 2014

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9 **UNITED STATES BANKRUPTCY COURT**  
10 **WESTERN DISTRICT OF WASHINGTON**  
**AT SEATTLE**

11 IN RE:

12 SAM A. ADAMS and ERIKA M. ADAMS,  
13 Debtors.  
14  
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No. 14-15003-MLB

**CREDITOR H-P PROPERTIES/ALL  
STAR, LLC'S MOTION FOR  
RELIEF FROM STAY BASED UPON  
DEBTORS FAILURE TO MAKE  
PAYMENTS AS COMPELLED BY  
COURT ORDER**

16 **NOTICE OF HEARING**

17 TO: THE CLERK OF THE COURT

18 AND TO: Sam A. Adams and Erika M. Adams, Debtors  
Lawrence K. Engel, Attorney for Debtor  
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20 PLEASE TAKE NOTE that Creditor H-P Properties/All Star, LLC ("Creditor"), Landlord  
21 of those premises located at 2629 SW Andover Street, Seattle, Washington 98126, through its  
22 attorney of record, Oseran Hahn, P.S., David M. Tall, of counsel will present and issue of law in

CREDITOR H-P PROPERTIES/ALL STAR, LLC'S MOTION  
FOR RELIEF FROM STAY BASED ON DEBTORS FAILURE  
TO MAKE PAYMENTS AS COMPELLED BY COURT ORDER-

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#98431.008

OSERAN HAHN P.S.  
10900 NE Fourth Street #1430  
Bellevue WA 98004  
Phone: (425) 455-3900  
Facsimile: (425) 455-9201

1 this case which will be heard on the date below Clerk of the Court is requested to note this issue on  
2 Judge Barreca's calendar for that day.

3 Hearing Date and Time. September 5, 2014 @ 9:30 a.m.

4 Location. U.S. Bankruptcy Court, 700 Stewart St., Courtroom 7106, Seattle, WA.

5 Nature of Motion. The Motion is for Relief from Stay based upon Debtor's failure to  
6 comply with this Court's order of August 11, 2014. The motion is sought pursuant to the authority  
7 granted under 11 U.S.C § 362 and 365.

8 Your response to this motion must be filed and served at least seven days prior to the date  
9 of the hearing; if no response is filed within this time the Court may in its discretion grant the  
10 motion prior to the hearing without further notice.

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12 **MOTION**

13 COMES NOW Creditor by and through its attorneys of record, Oseran Hahn, P.S., David  
14 M. Tall of counsel, and moves the Court for entry of an order for relief from stay to allow the  
15 Creditor to pursue its state remedies including seeking an order for a writ of restitution of the  
16 subject premises based upon Debtor's failure to comply with this Court's Order, entered of  
17 record on August 11, 2014.

18 This Motion is a based upon the Declarations of John Pietromonaco and David M. Tall  
19 filed contemporaneously herewith.

20 DATED: August 13, 2014.

21 OSERAN, HAHN, P.S.

22 By 

DAVID M. TALL, WSBA #12849

Attorney for H-P PROPERTIES/ALL STAR, LLC

CREDITOR H-P PROPERTIES/ALL STAR, LLC'S MOTION  
FOR RELIEF FROM STAY BASED ON DEBTORS FAILURE  
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